

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

BEE CREEK PHOTOGRAPHY, LLC

Plaintiff,

v.

VIEWS OF TEXAS LLC

Defendant.

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Case No: 4:25-cv-01553

**MOTION IN SUPPORT OF PLAINTIFF'S
REQUEST FOR ENTRY OF DEFAULT PURSUANT TO FED.R.CIV. 55(a)**

I, JAMES H. FREEMAN, declare under the penalty of perjury that the following is true and correct to the best of my personal knowledge.

1. I am counsel for Plaintiff Bee Creek Photography, LLC ("Plaintiff").
2. I submit this Declaration in support of Plaintiff's request for the Clerk's entry of default pursuant to Rule 55(a) of the Federal Rules of Civil Procedure. Fed.R.Civ.P. 55(a).
3. Defendant Views of Texas LLC ("Defendant") is not an infant, in the military or an incompetent person.
4. Defendant's answer or response to the Complaint was due on May 19, 2025.
Defendant has failed to plead or otherwise defend the action.
5. As per the Affidavit of Service, filed on April 29, 2025 [Docket No. 8], the pleading to which no response has been made was properly served.

Dated: June 27, 2025

Uniondale, New York

/s/jameshfreeman/
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